

# **EXHIBIT D**

### STIPULATION

Disclosure and discovery activity in the matter captioned *Oracle USA, Inc., et al. v. Rimini Street, Inc., et al.*, 2:10-cv-00106-LRH-PAL - currently pending in the United States District Court for the District of Nevada – (the “Action”) are likely to involve production of confidential, proprietary, or private information by non-party business competitors of the Plaintiffs and Defendants for which special protection from public disclosure and from use for any purpose other than defending against this litigation would be warranted. Accordingly, Plaintiffs Oracle USA, Inc., Oracle America, Inc. and Oracle International Corporation (collectively, “Plaintiffs”); Defendants Rimini Street, Inc. and Seth Ravin (collectively, “Defendants”) and third-party subpoena recipient CedarCrestone, Inc. (“CedarCrestone”) hereby stipulate to enter into the following Stipulation which is designed to supplement the Stipulated Protective Order (the “Order”) signed by the Court in the Action on May 21, 2010. Except to the extent that it modifies the Order, the Stipulation incorporates the Order by reference.

It is hereby STIPULATED as follows:

1. In the event that a dispute arises between the Plaintiffs and/or the Defendants and CedarCrestone regarding CedarCrestone’s designation of documents as “Highly Confidential – Attorneys Eyes Only,” the Plaintiffs, Defendants and CedarCrestone agree that none will argue to the Court that, by including within the definition of “Confidential Information” categories of documents that may in some instances constitute “trade secrets,” the Order was designed to modify what constitutes a “trade secret” entitled to designation as “Highly Confidential Information – Attorneys Eyes Only.”

2. The Plaintiffs and Defendants stipulate that they will provide CedarCrestone with 5 days written notice before showing documents designated by CedarCrestone as “Confidential Information” or “Highly Confidential Information – Attorneys’ Eyes Only” to a third-party

deponent other than a representative of CedarCrestone. Such notice will be provided by electronic mail to the counsel for CedarCrestone. In the event that a document designated by CedarCrestone as "Confidential Information" or "Highly Confidential Information – Attorneys Eyes Only" is used at a party deposition, the party eliciting testimony concerning such document will request that the relevant portion of the deposition transcript be marked with the equivalent confidentiality designation on CedarCrestone's behalf.

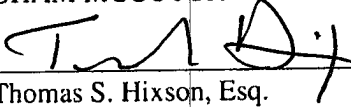
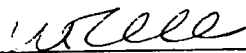

3. In the event that the Plaintiffs or Defendants elect to file CedarCrestone's "Confidential Information" or "Highly Confidential Information – Attorneys' Eyes Only"-designated documents with the Court, the Plaintiffs or Defendants agree to move the Court to seal them. The party so moving to file CedarCrestone's documents under seal will serve counsel for CedarCrestone with the motion to file under seal and related pleadings at the time of filing same by electronic and regular mail.

4. The foregoing stipulation resolves the issues in the meet and confer between CedarCrestone and Oracle concerning Oracle's subpoena. Accordingly, CedarCrestone will produce documents responsive to Oracle's subpoena, as modified by Chad Russell's May 8, 2011 letter to Robert T. Gill.

5. The foregoing stipulation resolves the issues in the meet and confer between CedarCrestone and Rimini Street concerning Rimini Street's subpoena. Accordingly, CedarCrestone will produce documents responsive to Rimini Street's subpoena.

IT IS SO STIPULATED, THROUGH COUNSEL:

Dated: July 19, 2011

<p>BINGHAM MCCUTCHEN LLP</p> <p>By: </p> <p>Thomas S. Hixson, Esq. Three Embarcadero Center San Francisco, CA 94111-4067 Telephone: (415) 393-2000 Facsimile: (415) 393-2286 thomas.hixson@bingham.com</p> <p><i>Attorneys for Oracle USA, Inc., Oracle America, Inc. and Oracle International Corporation</i></p>	<p>PEABODY &amp; ARNOLD LLP</p> <p>By: </p> <p>Robert T. Gill, Esq. Federal Reserve Plaza 600 Atlantic Avenue Boston, Massachusetts 02210 Telephone: (617) 951-4706 Facsimile: (617) 951-2125 Email: rgill@peabodyarnold.com</p> <p><i>Attorneys for CedarCrestone, Inc.</i></p>
<p>SHOOK, HARDY &amp; BACON LLP</p> <p>By: </p> <p>Robert H. Reckers, Esq. (<i>pro hac vice</i>) 600 Travis Street, Suite 1600 Houston, Texas 77002 Telephone: (713) 227-8008 Facsimile: (731) 227-9508 <a href="mailto:rreckers@shb.com">rreckers@shb.com</a></p> <p><i>Attorneys for Rimini Street, Inc. and Seth Ravin</i></p>	

748182\_1  
11040-95213